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 15 *Attorneys or Alan Shinderman*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE  
 19 COMMISSION,

20 Case No.: 2:23-cv-00288-APG-DJA

21 Plaintiff,

22 **STIPULATION AND ORDER TO  
 23 EXTEND TIME TO RESPOND TO  
 24 MOTIONS TO COMPEL**

25 vs.  
 26 MARKMAN BIOLOGICS CORP. and ALAN  
 27 SHINDERMAN,

28 Defendant.

and  
 29  
 30 ASPEN ASSET MANAGEMENT  
 31 SERVICES, LLC

32  
 33 Defendant Alan Shinderman (“Mr. Shinderman”), by and through their undersigned  
 34 counsel of record, and Plaintiff, Securities and Exchange Commission (“Plaintiff”), by and  
 35 through their undersigned counsel of record, hereby stipulate and agree as follows:

36 1. There are ongoing discovery disputes in this case as reflected by the SEC’s  
 37 motion to compel (ECF No. 65), motion for leave to take a second deposition from Mr.  
 38 Shinderman (ECF No. 71), and motion to extend the time frame for discovery (ECF No. 72).

1           2. On September 13, 2024, the Court granted motions by Marquis Aurbach Chtd.  
 2 and Lucosky Brookman LLP to withdraw their representation of Defendants (ECF Nos. 61  
 3 and 62); granted motions by Marquis Aurbach and Lucosky Brookman LLP motion to extend  
 4 time (ECF No. 73) and motion to shorten time (ECF No. 74). ECF No. 76. The Court further  
 5 ordered Defendants to respond to SEC's recent discovery motions (ECF Nos. 65, 71, and 72)  
 6 by November 11, 2024.

8           3. On September 18, 2024, Attorney Ross C. Goodman entered an appearance in  
 9 this matter on behalf of Mr. Shinderman (ECF No. 77) and Attorney Richard Bruce Herman's  
 10 verified petition (ECF No. 78) for permission to practice pro vice in this matter on behalf of  
 11 Mr. Shinderman was approved on September 19, 2024, the Court granted. ECF No. 79.

12          4. The Parties met for a conference on November 5, 2024 to discuss additional time  
 13 familiarize with the details on this case, review additional discovery, and discuss settlement.

15          5. The Parties have agreed to extend the deadline for Defendants to file a response to  
 16 Plaintiff's Motion from November 11, 2024, to December 11, 2024.

17          6. As part of this extension, the parties request to continue the dispositive motion  
 18 deadline to sixty (60) days from the conclusion of fact discovery (if the Court grants one or more  
 19 of the SEC's pending motions (ECF Nos. 65, 71 and 72) or sixty (60) days from when the Court  
 20 denies the SEC's motions to compel (ECF Nos. 65, 71 and 72).

22 STIPULATED AND AGREED TO:  
 23 Dated this 6<sup>th</sup> day of November 2024.

24 By: /s/Edward J. Reilly  
 25 Edward J. Reilly Esq.  
 Derek Bentsen, Esq.  
 Ada Fernandez Johnson, Esq.  
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 28 *Attorneys for Plaintiff Securities*

1       *and Exchange Commission*

2       By: /s/ Ross C. Goodman

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8       *Shinderman*

9       By: /s/ Richard B. Herman

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14      *Attorney for Defendant Alan Shinderman*

15                   **IT IS SO ORDERED.**



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17                   Daniel J. Albrechts  
18                   United States Magistrate Judge

19                   DATED: 11/8/2024

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